

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WENDY McKEOWN,

Plaintiff,

Case No: 05 73244

Hon: Sean F. Cox

Magistrate R. Steven Whalen

vs.

LIVINGSTON COUNTY SHERIFF DEPUTY

PETER HAIRSTON,
Defendant.

KENNETH D. FINEGOOD P36170

KENNETH D. FINEGOOD, P.L.C.

Attorney for Plaintiff

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ANNE MCCLOREY MCLAUGHLIN P40455

CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C.

Attorney for Defendant

33900 Schoolcraft Road

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734 261 2400

PLAINTIFF'S OBJECTIONS TO BILL OF TAXABLE COSTS

Now Comes Plaintiff, Wendy McKeown, through her attorney Kenneth D. Finegood, P.L.C.
and for her objections states as follows:

1. Plaintiff Objects to the costs in the amount of \$382.60 and \$207.80, for deposition transcripts of plaintiff, for the reason that these charges are fees for "real time" transcription and "e-trans," which are not taxable, since "real time" transcription and electronic transcripts are for the convenience of the attorney and not necessary charges.

2. Plaintiff objects to the \$1,045.45 for the videotape transcript of Philip Friedman, M.D. for the reason these charges reflect fees for "expedited" transcript produced solely for the convenience of counsel, since defendant chose to schedule this deposition for September 11, 2007, one day before trial and the deposition was not played for the jury until one week later on September 18, 2007.

Additionally, this charge is a fee for “real time” transcription and “e-trans,” which are for the convenience of the attorney and not necessary charges. Additionally, this charge includes a \$395.00 charge for videotape which is not taxable for the reason that videotaping of the deposition was not ordered by the court. Further, this charge includes \$28.75 for next day air delivery, which is not taxable.

3. Plaintiff objects to the \$132.00 charge for the transcript of Mark Swankster for the reason that this was an expedited transcript for the convenience of counsel and further, there is no receipt in support of this charge.

4. Plaintiff objects to the \$154.80 charge for the transcript of Peter Hairston for the reason that it contains a charge for postage which is not taxable.

S/ Kenneth D. Finegood
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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2007, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

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